



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*50 Main Street, Suite 1100  
White Plains, New York 10606*

August 21, 2024

**VIA ECF**

The Honorable Cathy Seibel  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601

**Re: *United States v. Frank Butselaar*, 22 Cr. 560 (CS)**

Dear Judge Seibel:

The parties write jointly regarding a proposed schedule for expert disclosure and attendant motion practice in this matter.

Based on discussions the parties have had, the defense anticipates noticing an expert. Pursuant to Fed. R. Crim. P. 16(b)(1)(C)(ii), the parties respectfully request that the Court order that any defense expert disclosure, pursuant to Rule 16, be made to the Government by September 3, 2024 and any motion to preclude by the Government be filed by September 24, 2024.

Very truly yours,

DAMIAN WILLIAMS  
United States Attorney

by: s/\_\_\_\_\_  
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